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19 UNITED STATES OF AMERICA

20 UNITED STATES DISTRICT COURT  
21 FOR THE CENTRAL DISTRICT OF CALIFORNIA

22 UNITED STATES OF AMERICA,

23 No. 2:24-cr-00471-MWF

24 Plaintiff,

25 GOVERNMENT'S SECOND BILL OF  
26 PARTICULARS RE FORFEITURE  
27 ALLEGATIONS

v.

28 JUAN CARLOS THOLA-DURAN, ET AL.,

Notice is hereby given that the government, pursuant to the  
forfeiture allegations set forth in the Indictment, intends to seek  
criminal forfeiture of property including, but not limited to, the  
following:

- 24 • One 2019 Hyundai Tucson, VIN KM8J23A46KU990788;
- 25 • One 2019 Chevrolet Traverse, VIN 1GNERGKW1KJ304058;
- 26 • One 2017 Audi Q5, VIN WA1M2AFP3HA043639;
- 27 • One 2019 Honda Civic, VIN 19XFC2F60KE211704;
- 28 • One 2017 Nissan Rogue, VIN KNMAT2MT5HP502338;

- 1     • One 2015 Infiniti QX80, VIN JN8AZ2NC9F9372079;
- 2     • One 2016 Nissan Rogue, VIN JN8AT2MT7GW000813;
- 3     • One 2017 Chevrolet Traverse, VIN 1GNKRGKD6HJ295593;
- 4     • One 2017 Ford Explorer, VIN 1FM5K7DH5HGC21729;
- 5     • One 2014 Toyota Camry, VIN 4T1BF1FK2EU358573;
- 6     • One 2019 Mercedes-Benz AMG, VIN 4JGED6EB5KA153103;
- 7     • One 2017 Jaguar F-Pace, VIN SADCJ2BV5HA062731;
- 8     • One 2018 Ford Transit Connect, VIN NM0GS9E75J1361316;
- 9     • One 2015 Dodge Ram 1500 ProMaster, VIN 3C6TRVAG0FE502705;
- 10    • One 2012 Porsche Cayenne, VIN WP1AA2A28CLA04361;
- 11    • One 2017 Chevrolet Silverado 1500, VIN 3GCPRE1HG483020;
- 12    • One 2013 Ford F-150, VIN 1FTFX1CF2DKF05687;
- 13    • One 2017 Audi Q7, VIN WA1VAAF74HD004886;
- 14    • One 2014 Land Range Rover Evoque, VIN SALVT2BG2EH939025;
- 15    • One 2015 Lincoln MKZ, VIN 3LN6L2LU6FR629374;
- 16    • One 2016 Chevrolet Tahoe, VIN 1GNSKBKC0GR417735;
- 17    • One 2015 Ford Transit Van, VIN 1FTNR2CM1FKA03251;
- 18    • One 2015 Ford Explorer, VIN 1FM5K7D80FGC65490;
- 19    • One 2016 Ford Explorer XLT, VIN 1FM5K7D88GGA37982;
- 20    • One 2017 Chrysler Pacifica Wagon, VIN 2C4RC1CGXHR840415;
- 21    • One 2018 Chrysler Pacifica Wagon, VIN 2C4RC1CG0JR104993;
- 22    • One 2021 Chrysler Voyager Wagon, VIN 2C4RC1DG9MR549848;
- 23    • One 2014 Ford F-350 Super Duty, VIN 1FDRF3ET1EEB78810;
- 24    • One 14K white gold ring with princess cut diamond and bezel set  
25    diamond accents seized on August 28, 2024, in Canyon Country,  
26    CA;
- 27    • Two Steinhausean stainless steel watches with black bands seized  
28    on August 28, 2024, in Canyon Country, CA;

- 1     • Sixteen Steinhausean stainless steel watches with brown bands  
2         seized on August 28, 2024, in Canyon Country, CA;
- 3     • One Bulgari 18K yellow gold chain necklace with amethyst and  
4         diamond pendant seized on August 28, 2024, in Canyon Country,  
5         CA;
- 6     • One Bulgari 18K rose gold ring with identifying number MHTESE;
- 7     • One Cartier 18K white gold nail motif bracelet with bead set  
8         diamonds with identifying number CRD698665;
- 9     • One Cartier 18K white gold bracelet with repeating screw head  
10         impressions with identifying number GAF258;
- 11     • One 18K white gold chain necklace with 14K white gold diamond  
12         heart pendant seized on August 28, 2024 in Canyon Country, CA;
- 13     • One 14K white gold Cubic Zirconia (damaged) pendant with bead  
14         and channel set diamonds seized on August 28, 2024, in Canyon  
15         Country, CA;
- 16     • One Single 14K white gold princess cut diamond earring seized on  
17         August 28, 2024, in Canyon Country, CA;
- 18     • One 18K yellow gold ring with baguette and rounds diamonds with  
19         identifying number 139139;
- 20     • One 14K yellow gold bead set diamond ring seized on August 28,  
21         2024, in Canyon Country, CA;
- 22     • One Cartier 18K rose gold ring with screw head impressions and  
23         three (3) diamonds with identifying number QG1920;
- 24     • One 18K white gold ring with screw head impressions seized on  
25         August 28, 2024, in Canyon Country, CA;
- 26     • One 18K rose gold cross shaped pendant with black and clear  
27         diamonds with TDW Stamp DO19 CD096;

- One Cartier 18K yellow gold bracelet with ten (10) diamonds and metal screw driver with identifying number QP6530;
- One 14K white gold diamond ring seized on August 28, 2024, in Canyon Country, CA;
- One Gucci stainless steel watch with feline face seized on August 28, 2024, in Canyon Country, CA; and
- \$17,800 in U.S. Currency seized on August 28, 2024, in Canyon Country, CA

Dated: February 5, 2025

Respectfully submitted,

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/s/ Ryan Waters  
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